

21 cr 173 WMW/DTS

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No.

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

18 U.S.C. § 2

18 U.S.C. § 1591

v.

18 U.S.C. § 1594

21 U.S.C. § 853

1. ANTON JOSEPH LAZZARO,
a/k/a Tony Lazzaro,
a/k/a Tony,

28 U.S.C. § 2461

and

2. GISELA CASTRO MEDINA,
a/k/a Gisela Medina,

Defendants.

THE UNITED STATES GRAND JURY CHARGES THAT:

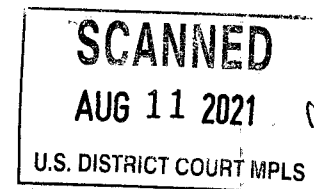
COUNT 1

(Conspiracy To Commit Sex Trafficking of Minors)

1. From in or about May 2020 through in or about December 2020, in the State
and District of Minnesota, the defendants,

**ANTON JOSEPH LAZZARO,
a/k/a Tony Lazzaro,
a/k/a Tony, and
GISELA CASTRO MEDINA,
a/k/a Gisela Medina,**

in and affecting interstate commerce, conspired with each other and others known and
unknown to the Grand Jury to knowingly recruit, entice, harbor, transport, provide, obtain,
maintain, patronize, and solicit minors, namely MINOR VICTIMS A, B, C, D, E, and F



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knowing and in reckless disregard of the fact and having had a reasonable opportunity to observe that MINOR VICTIMS A, B, C, D, E, and F had not attained the age of 18 years, to engage in a commercial sex act, all in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), 1591(c), and 1594(c).

COUNT 2

(Sex Trafficking of a Minor)

2. From in or about May 2020 through in or about June 2020, in the State and District of Minnesota, the defendants,

**ANTON JOSEPH LAZZARO,
a/k/a Tony Lazzaro,
a/k/a Tony, and
GISELA CASTRO MEDINA,
a/k/a Gisela Medina,**

aiding and abetting one another, in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, maintained, patronized, and solicited MINOR VICTIM A to engage in a commercial sex act and attempted to do so, knowing and in reckless disregard of the fact and having had a reasonable opportunity to observe that MINOR VICTIM A had not attained the age of 18 years, all in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), 1591(c), 1594(a), and 2.

COUNT 3

(Sex Trafficking of a Minor)

3. From in or about June of 2020 through in or about July of 2020, in the State and District of Minnesota, the defendants,

**ANTON JOSEPH LAZZARO,
a/k/a Tony Lazzaro,
a/k/a Tony, and**

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**GISELA CASTRO MEDINA,
a/k/a Gisela Medina,**

aiding and abetting one another, in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, maintained, patronized, and solicited MINOR VICTIM B to engage in a commercial sex act and attempted to do so, knowing and in reckless disregard of the fact and having had a reasonable opportunity to observe that MINOR VICTIM B had not attained the age of 18 years, all in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), 1591(c), 1594(a), and 2.

COUNT 4

(Sex Trafficking of a Minor)

4. From in or about June of 2020 through in or about October of 2020, in the State and District of Minnesota, the defendants,

**ANTON JOSEPH LAZZARO,
a/k/a Tony Lazzaro,
a/k/a Tony, and
GISELA CASTRO MEDINA,
a/k/a Gisela Medina,**

aiding and abetting one another, in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, maintained, patronized, and solicited MINOR VICTIM C to engage in commercial sex and attempted to do so, knowing and in reckless disregard of the fact and having had a reasonable opportunity to observe that MINOR VICTIM C had not attained the age of 18 years, all in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), 1591(c), 1594(a), and 2.

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COUNT 5

(Sex Trafficking of a Minor)

5. From in or about July of 2020 through in or about October of 2020, in the State and District of Minnesota, the defendants,

**ANTON JOSEPH LAZZARO,
a/k/a Tony Lazzaro,
a/k/a Tony, and
GISELA CASTRO MEDINA,
a/k/a Gisela Medina,**

aiding and abetting one another, in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, maintained, patronized, and solicited MINOR VICTIM D to engage in a commercial sex act and attempted to do so, knowing and in reckless disregard of the fact and having had a reasonable opportunity to observe that MINOR VICTIM D had not attained the age of 18 years, all in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), 1591(c), 1594(a), and 2.

COUNT 6

(Sex Trafficking of a Minor)

6. From in or about July of 2020 through in or about October of 2020, in the State and District of Minnesota, the defendants,

**ANTON JOSEPH LAZZARO,
a/k/a Tony Lazzaro,
a/k/a Tony, and
GISELA CASTRO MEDINA,
a/k/a Gisela Medina,**

aiding and abetting one another, in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, maintained, patronized, and solicited MINOR VICTIM E to engage in a commercial sex act and attempted to do so, knowing

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and in reckless disregard of the fact and having had a reasonable opportunity to observe that MINOR VICTIM E had not attained the age of 18 years, all in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), 1591(c), 1594(a) and 2.

COUNT 7

(Attempted Sex Trafficking of a Minor)

7. From in or about August of 2020 through in or about November of 2020, in the State and District of Minnesota, the defendant,

**ANTON JOSEPH LAZZARO,
a/k/a Tony Lazzaro,
a/k/a Tony,**

in and affecting interstate commerce, knowingly attempted to recruit, entice, harbor, transport, provide, obtain, maintain, patronize, and solicit MINOR VICTIM F to engage in a commercial sex act and attempted to do so, knowing and in reckless disregard of the fact and having had a reasonable opportunity to observe that MINOR VICTIM F had not attained the age of 18 years, all in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), 1591(c), and 1594(a).

COUNT 8

(Sex Trafficking - Obstruction)

8. In or about July 2020, in the State and District of Minnesota, the defendant,

**ANTON JOSEPH LAZZARO,
a/k/a Tony Lazzaro,
a/k/a Tony,**

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knowingly and intentionally obstructed, and attempted to obstruct, and knowingly and intentionally interfered with and prevented the enforcement of Title 18, United States Code, Section 1591(a), all in violation of Title 18, United States Code, Sections 1591(d).

COUNT 9

(Sex Trafficking - Obstruction)

9. In or about October of 2020, in the State and District of Minnesota, the defendant,

**ANTON JOSEPH LAZZARO,
a/k/a Tony Lazzaro,
a/k/a Tony,**

knowingly and intentionally obstructed, and attempted to obstruct, and knowingly and intentionally interfered with and prevented the enforcement of Title 18, United States Code, Section 1591(a), all in violation of Title 18, United States Code, Section 1591(d).

COUNT 10

(Sex Trafficking – Obstruction)

10. In or about March of 2021, in the State and District of Minnesota, the defendants,

**ANTON JOSEPH LAZZARO,
a/k/a Tony Lazzaro,
a/k/a Tony, and
GISELA CASTRO MEDINA,
a/k/a Gisela Medina,**

aiding and abetting one another, knowingly and intentionally obstructed, and attempted to obstruct, and knowingly and intentionally interfered with and prevented the enforcement

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of Title 18, United States Code, Section 1591(a), all in violation of Title 18, United States Code, Sections 1591(d) and 2.

FORFEITURE ALLEGATIONS

11. Counts 1 through 10 of this Indictment are fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 1594.

As a result of the offenses charged in Counts 1 through 10, the defendants' shall forfeit the following property to the United States pursuant to Title 18, United States Code, Section 1594:

- (1) Any property, real or personal, involved in, used or intended to be used to commit or to facilitate the commission of the offenses, and any property traceable to such property; and
- (2) Any property, real or personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the offenses, or any property traceable to such property.

The property subject to forfeiture includes, but is not limited to:

- (a) the real property located at 201 11th Street South, #1920, Minneapolis, MN 55402, with property ID number 27-029-24-14-0589;
- (b) a 2010 Ferrari convertible, VIN ZFF65LJA9A0173846;
- (c) \$371,240.00 in U.S. Currency seized from 201 11th Street South, #1920, Minneapolis, MN 55402 on December 15, 2020;

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- (d) a Microsoft Windows Surface Pro-1645 Tablet, serial number 005260151452;
- (e) a Blackberry cellphone, serial number 1163831917;
- (f) a black Apple iPhone cellphone, serial number DNPVH35SHG71;
- (g) an Alcatel TCL cellphone, serial number 15145008637858;
- (h) a Xiamoi cellphone, serial number 1884828VN00206;
- (i) 4 Thumb Drives seized from 201 11th Street South, #1920, Minneapolis, MN 55402 on December 15, 2020;
- (j) 14 SD Cards seized from 201 11th Street South, #1920, Minneapolis, MN 55402 on December 15, 2020;
- (k) a silver Dell XPS laptop, serial number 6KGP9H2/14298070070;
- (l) a Dell Inspiron 3593 laptop, serial number JVMV943/43271725539;
- (m) a gray/black Motorola Moto e5 cellphone, serial number ZY323G7XXF;
- (n) a white/black Motorola One cellphone, IMEI: 352169100855557;
- (o) an LG LM-X210APM cellphone, serial number 001VTYK861266;
- (p) an Apple iPhone model A1662 cellphone seized from 201 11th Street South, #1920, Minneapolis, MN 55402 on December 15, 2020;
- (q) an LG model LM-X210APM cellphone, serial number 809VTFW411651;
- (r) a black/silver Apple iPhone, model A1549 seized from 201 11th Street South, #1920, Minneapolis, MN 55402 on December 15, 2020;
- (s) a Bittium Tough Mobile 2 cellphone with IMEI: 357320100013706;

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- (t) a GPS tracker seized from 201 11th Street South, #1920, Minneapolis, MN 55402 on December 15, 2020;
- (u) a Blackberry cellphone with 32 GB SD Card with IMEI: 015103000107958;
- (v) a Microsoft Windows Surface tablet with charging cord seized from 201 11th Street South, #1920, Minneapolis, MN 55402 on December 15, 2020;
- (w) an Apple iPhone 11, serial number FK2ZJ2BHN72J;
- (x) an Apple iPad Pro-A1701 with charger, serial number DMPVP02WJ28N;
and
- (y) an Apple Macbook Air-A2179 with charger, serial number C02D7EUDMNHP.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

ACTING UNITED STATES ATTORNEY

FOREPERSON